



PHONE 328-1040

## WOODLAWN GRAVEL COMPANY

P. O. BOX 2501 • WILMINGTON, DELAWARE 19805

RECEIVED

February 25, 1977

MAR 2 - 1977

3

WATER POLLUTION DIVISION

Department of Natural Resources  
and Environmental Control  
Division of Environmental Control  
Tatnall Building  
Dover, Delaware 19901

Attn: Mr. Robert J. Touhey  
Supervisor Water Pollution  
Control

Re: Woodlawn Gravel Company (NPDES Permit No. DE0050245)

Dear Mr. Touhey:

We are receipt of your letter of February 16, 1977 regarding our Preliminary Engineering Report related to the above mentioned facility. Thank you for affording our consultant the opportunity to discuss the contents of the letter with Dr. Ramesh Dwivedy. We trust that the statements below generally conform to the matters discussed during the telephone conversation:

1. As it was noted in Section III and Attachment E of the referenced report, we understand that the settling pond should be dredged to a depth of 10 feet in order to achieve the desired retention time to assure compliance with our NPDES permit.
2. "The report does not provide dates as to when activities mentioned under item (2), (a) thru (g) of Recommendations ... will be performed in that, as indicated in the report, the facility is not currently operational. Start-up of the facility is dependent upon factors which are beyond our control and thus, the recommendations are all scheduled to be implemented after start-up. As noted in the report, the initial activity will be a sampling program which will begin four days after start-up. All other activities will follow in a timely fashion, thereafter, if warranted.
3. Once again preliminary sampling and testing of the effluent to determine adequacy or nonadequacy of the system is predicated upon start-up of the facility. We understand the recommendations of our consultant and will initiate the sampling program within four days of the facility start-up.

028194

001374

• WASHED SAND & GRAVEL • BANK GRAVEL • TOP SOIL • FILL DIRT • SELECT MATERIAL • CRUSHED STONE •

4. Please note that our consultant concludes, "...the facility appears to be capable of meeting effluent requirements if it is adequately maintained". Thus, it is our opinion, that the report is directly responsive to our NPDES permit and we have received the necessary assurances, given the conditions that prevailed at the time, that our current facilities are adequate to achieve these limitations. It should be noted that the facility is a total recycle system in the sense that Pigeon Run flows uninterrupted with the exception of make-up water withdrawal. We understood the comingling of fresh water make-up with recycled process water to be of no consequence as long as discharge limitations are met.
5. In view of the above, we are sure that you will now concur that a final design report is not required. Based on historical and current data, our consultant has concluded that our facility is capable of meeting the final permit limitations. As a precaution however, he has developed a program by which we can monitor the efficiency of our facility at the outset of production. This program will serve not only to verify certain assumptions that had to be made in the preparation of the report, but also to protect our interests and yours by taking the steps necessary to insure continuing compliance.

We look forward to a timely and an affirmative response to this letter. If you should have any further questions, please do not hesitate to call.

Very truly yours,

WOODLAWN GRAVEL CO.

*Frank Landa*  
Frank Landa  
Manager

FL:es

cc: CABE Assoc., Inc.  
Attn: Mr. Lee Beetschen, P.E.

Potter, Anderson & Carroon  
Attn: Mr. William Poole

028195

39 001375